
Exhibit 4

00876997

Jennifer DaMico

From: Jason S. Brookner <jbrookner@grayreed.com>
Sent: Thursday, March 2, 2023 10:58 PM
To: Milica Filipovic; ian@lawinannarbor.com; racine@themichiganlawfirm.com
Cc: Amber M. Carson; Jennifer Damico; Erin Carpenter
Subject: External Re: Tehum Chapter 11

Ok.

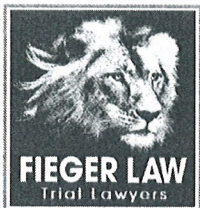
Thx for the response. Regardless of outcome tomorrow, we look forward to working with you in a collaborative fashion to the best extent possible.

From: Milica Filipovic <m.filipovic@fiegerlaw.com>
Sent: Thursday, March 2, 2023 9:56:10 PM
To: Jason S. Brookner <jbrookner@grayreed.com>; ian@lawinannarbor.com <ian@lawinannarbor.com>; racine@themichiganlawfirm.com <racine@themichiganlawfirm.com>
Cc: Amber M. Carson <acarson@grayreed.com>; Jennifer Damico <j.damico@fiegerlaw.com>; Erin Carpenter <e.carpenter@fiegerlaw.com>
Subject: [EXTERNAL] RE: Tehum Chapter 11

I understand. As I stated, I don't believe that the Stay should be extended to Genesee County who is listed on the exhibit.

I agree its not personal. We have to represent our clients as best as we can too. Again, I will defer to Ian and Racine. If they have terms that they will agree to, I will concur, otherwise, I owe it to my clients to voice their objections.

Best,



Milica Filipovic
Attorney & Counselor
m.filipovic@fiegerlaw.com

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From: Jason S. Brookner <jbrookner@grayreed.com>
Sent: Thursday, March 2, 2023 10:43 PM
To: Milica Filipovic <m.filipovic@fiegerlaw.com>; ian@lawinannarbor.com; racine@themichiganlawfirm.com
Cc: Amber M. Carson <acarson@grayreed.com>; Jennifer Damico <j.damico@fiegerlaw.com>; Erin Carpenter <e.carpenter@fiegerlaw.com>
Subject: External Re: Tehum Chapter 11

As I stated, the extension of the automatic stay would apply only to the individuals listed on the exhibit. If you think the order is not sufficiently clear on that point and clarity would get your agreement, then we would certainly welcome your suggested revisions.

However, if you would rather proceed tomorrow, that is certainly your prerogative, we don't fault you for that, and we will argue accordingly. No harm no foul, this is not personal for me or our firm. We were hired the day before the chapter 11 was filed, and we are all just doing our jobs.

From: Milica Filipovic <m.filipovic@fiegerlaw.com>

Sent: Thursday, March 2, 2023 9:38:06 PM

To: Jason S. Brookner <jbrookner@grayreed.com>; ian@lawinannarbor.com <ian@lawinannarbor.com>;
racine@themichiganlawfirm.com <racine@themichiganlawfirm.com>

Cc: Amber M. Carson <acarson@grayreed.com>; Jennifer Damico <j.damico@fiegerlaw.com>; Erin Carpenter
<e.carpenter@fiegerlaw.com>

Subject: [EXTERNAL] RE: Tehum Chapter 11

Good evening Mr. Brookner,

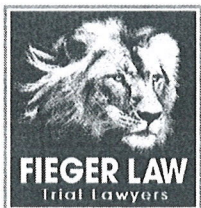
The way that I read the proposed order is that section 4 would apply to the doctor and four individual nurses who were employed by Corizon, whether individually listed in the chart or not. Nevertheless, as it relates to the Estate of Kerrie Milkiewicz, it is my firm position that if Genesee County wants to stay to apply to them, they will need to file for the requested relief in our case before our judge in our federal court which has been pending for nearly 6 years.

Additionally, if the doctor and four nurses that watched my client deteriorate in a jail cell until her last breathe want relief, they too can seek it. If it truly does not apply to them and I am mistaken, the stay applying to Genesee County would have the same effect. I am not inclined to agree with any terms when not a single defendant in my case is subject to Bankruptcy. I intend to move forward with the prosecution of my case as scheduled. Genesee County is of the position that they have no liability. Let them file their motion for summary judgement, and if I prevail, they can seek a stay. If they do, this is all moot.

I do not speak on behalf of Mr. Cross' claimants or Ms. Millers, however given that the briefing was filed jointly, I will defer to them. We will be in touch tomorrow.

Enjoy your evening.

Best,



Milica Filipovic

Attorney & Counselor

m.filipovic@fiegerlaw.com

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Cc: Amber M. Carson <acarson@grayreed.com>
Subject: External Tehum Chapter 11

Counsel, good evening. Ian has previously corresponded with Amber, but I'm going to take another run at you all....

Attached is a form of revised order, showing track changes from the version we filed Monday at Docket No. 30 which (i) is interim for 35 days, (ii) extends ONLY to the cases and individuals listed on the exhibit and (iii) has now been agreed to in principle by 4 parties (one of whom objected, and 3 of whom are not objecting because we agreed to the attached edits).

It looks like our current relief only applies to 4 of your cases/clients: Milkiewicz, Lyles, Jackson and Kelly. None of your other cases appear to be affected/covered by the interim relief we'll be seeking tomorrow.

So, with that, please let us know if (A) the attached works for you to stand down for tomorrow or (B) if there are other edits you would like to see that result in standing down tomorrow (subject to our review and approval, of course).

The Docket is available for free on the KCC website,
here: <https://link.edgepilot.com/s/5680cf82/WQgFtysghUmQG4AtjTOnPQ?u=https://www.kccllc.net/tehum/document/list/5819>

Thank you and have a good evening.

Jason S. Brookner

Partner

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